UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT EASTERN DISTRICT-WI FILED

2018 JUN 26 P 5: 09

UNITED STATES OF AMERICA,

v.

STEPHEN C. DRIES CLERK

Plaintiff,

18-CR-143

Case No. 18-CR-[18 U.S.C. § 2339B(a)(1)]

WAHEBA ISSA DAIS, a/k/a Hind Salah Eddin,

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between a date unknown, but no later than January 4, 2018, and continuing through June .

13, 2018, in the state and Eastern District of Wisconsin,

WAHEBA ISSA DAIS, a/k/a Hind Salah Eddin,

knowingly attempted to provide "material support and resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit, services, including expert advice and assistance, to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

THE GRAND JURY CHARGES THAT:

Between a date unknown, but no later than January 4, 2018, and continuing through June 13, 2018, in the state and Eastern District of Wisconsin,

WAHEBA ISSA DAIS, a/k/a Hind Salah Eddin,

knowingly attempted to provide "material support and resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), to wit, personnel (herself and others), to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

Foreperson Vie 24,2018

MATTHEW D. KKUEGER United States Attorney